

# EXHIBIT 16

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

\_\_\_\_\_  
UNITED STATES, ) 1:23-cv-00108-LMB-JFA  
et al., )  
)  
Plaintiffs, )  
)  
vs. )  
)  
GOOGLE LLC, )  
)  
Defendant. )  
\_\_\_\_\_)

VIDEOTAPED DEPOSITION OF  
LARA STOTT  
September 18, 2023  
9:33 a.m.

Reported by: Bonnie L. Russo  
Job No. 6097869

<p style="text-align: right;">Page 2</p> <p>1 Videotaped Deposition of Lara Stott held at:</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6 Paul Weiss Rifkind Wharton &amp; Garrison, LLP</p> <p>7 2001 K Street, N.W.</p> <p>8 Washington, D.C.</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18 Pursuant to Notice, when were present on behalf</p> <p>19 of the respective parties:</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">Page 4</p> <p>1 APPEARANCES (CONTINUED):</p> <p>2</p> <p>3 Also Present:</p> <p>4 Captain Michael Ellis, Deputy Staff Advocate,</p> <p>5 Air Force Recruiting</p> <p>6 Lieutenant Grant Wahlquist, Air Force</p> <p>7 Commercial Law, Field Support Center</p> <p>8 Orson Braithwaite, Videographer</p> <p>9</p> <p>10 Also Present Via Remotely:</p> <p>11 Katherine Clemons, DOJ</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 On behalf of the Plaintiffs:</p> <p>4 MARK H.M. SOSNOWSKY, ESQUIRE</p> <p>5 RACHEL ZWOLINSKI, ESQUIRE</p> <p>6 ALVIN CHU, ESQUIRE</p> <p>7 UNITED STATES DEPARTMENT OF JUSTICE</p> <p>8 450 Fifth Street, N.W.</p> <p>9 Washington, D.C. 20530</p> <p>10 mark.sosnowsky@usdoj.gov</p> <p>11 rachel.zwolinski@usdoj.gov</p> <p>12 alvin.chu.liu@usdoj.gov</p> <p>13</p> <p>14 On behalf of the Defendant:</p> <p>15 HEATHER MILLIGAN, ESQUIRE</p> <p>16 MARTHA L. GOODMAN, ESQUIRE</p> <p>17 PAUL, WEISS, RIFKIND, WHARTON &amp;</p> <p>18 GARRISON, LLP</p> <p>19 2001 K Street, N.W.</p> <p>20 Washington, D.C. 20006</p> <p>21 hmilligan@paulweiss.com</p> <p>22 mgoodman@paulweiss.com</p>	<p style="text-align: right;">Page 5</p> <p>1 I N D E X</p> <p>2 EXAMINATION OF LARA STOTT PAGE</p> <p>3 BY MS. MILLIGAN 9</p> <p>4</p> <p>5 EXHIBITS</p> <p>6 Exhibit 118 LinkedIn Profile of 15</p> <p>7 Lara Stott</p> <p>8 Exhibit 119 E-Mail Chain 36</p> <p>9 dated 9-14-22</p> <p>10 USAF-ADS-0000860595-602</p> <p>11 Exhibit 120 Article entitled 37</p> <p>12 "Recruiting is hard.</p> <p>13 these YouTubers may have</p> <p>14 cracked the code"</p> <p>15 Exhibit 121 E-Mail Chain 86</p> <p>16 dated 6-14-22</p> <p>17 Attachment</p> <p>18 USAF-ADS-0000861537-609</p> <p>19 Exhibit 122 E-Mail Chain 122</p> <p>20 dated 9-18-22</p> <p>21 Attachment</p> <p>22 USAF-ADS-0000001422-476</p>

<p style="text-align: right;">Page 50</p> <p>1 those events as well.</p> <p>2 BY MS. MILLIGAN:</p> <p>3 Q. And where -- where does he post</p> <p>4 those videos?</p> <p>5 A. On his YouTube channel, and then I</p> <p>6 believe -- again, I'm not entirely sure, but I</p> <p>7 believe that he is also going to be posting</p> <p>8 cut-downs of those videos on his social media</p> <p>9 accounts. Whether that be Facebook or</p> <p>10 Instagram, I'm not sure.</p> <p>11 Q. All right. And just so I</p> <p>12 understand, his -- his contract is with GSD&amp;M;</p> <p>13 is that right?</p> <p>14 MR. SOSNOWSKY: Objection. Form.</p> <p>15 Foundation.</p> <p>16 THE WITNESS: Yes, it is.</p> <p>17 BY MS. MILLIGAN:</p> <p>18 Q. Did -- did the overall message of</p> <p>19 this article come as a surprise to you when you</p> <p>20 first read it?</p> <p>21 MR. SOSNOWSKY: Objection. Form.</p> <p>22 THE WITNESS: So the message of the</p>	<p style="text-align: right;">Page 52</p> <p>1 how air force recruiting service uses social</p> <p>2 media to recruit?</p> <p>3 MR. SOSNOWSKY: Objection.</p> <p>4 Foundation.</p> <p>5 THE WITNESS: No. We were already</p> <p>6 using social media like this before this</p> <p>7 article came out.</p> <p>8 BY MS. MILLIGAN:</p> <p>9 Q. Okay. And when you say "like this,"</p> <p>10 what do you mean?</p> <p>11 A. Using airmen ambassadors as</p> <p>12 influencers on our social media channels and</p> <p>13 partnering with external organizations, such as</p> <p>14 the UFC, to work with people who have large</p> <p>15 social media followings.</p> <p>16 Q. And to the best of your knowledge,</p> <p>17 is that what the BBP -- is that the message</p> <p>18 the --</p> <p>19 A. The bullet background paper.</p> <p>20 Q. -- the bullet background paper</p> <p>21 conveyed?</p> <p>22 A. Without seeing the bullet background</p>
<p style="text-align: right;">Page 51</p> <p>1 article is not surprising. The -- some of the</p> <p>2 conclusions that the author makes I disagree</p> <p>3 with.</p> <p>4 BY MS. MILLIGAN:</p> <p>5 Q. Okay. For example what -- I'm</p> <p>6 sorry. Strike that.</p> <p>7 Could you give me an example of one</p> <p>8 of the conclusions that you disagree with.</p> <p>9 A. And, again, it has been several</p> <p>10 months since I read this article in full, but</p> <p>11 some of the influencers that she was</p> <p>12 interviewing, while I agree with them that</p> <p>13 content needs to be authentic and be relevant</p> <p>14 to social media users, in this instance,</p> <p>15 Generation Z, I do not necessarily buy into the</p> <p>16 notion that people who are outside the air</p> <p>17 force can necessarily tell an accurate air</p> <p>18 force story unless they have a personal</p> <p>19 connection to the air force.</p> <p>20 Q. Understood. Did this article,</p> <p>21 Exhibit 120, and in the questions that arose</p> <p>22 out of it, for example, with the TMT, change</p>	<p style="text-align: right;">Page 53</p> <p>1 paper, it's hard for me to answer that.</p> <p>2 Q. Okay. Fair.</p> <p>3 Has the way that AFRS uses social</p> <p>4 media to recruit changed at all since you first</p> <p>5 joined AFRS?</p> <p>6 MR. SOSNOWSKY: Objection. Form.</p> <p>7 THE WITNESS: I don't believe it has</p> <p>8 changed. It has probably continued to evolve,</p> <p>9 but it hasn't -- I believe AFRS was already</p> <p>10 kind of on this path before.</p> <p>11 What we are trying to do right now</p> <p>12 is to kind of tweak, refine, and make sure that</p> <p>13 the content that we're putting on social media</p> <p>14 continues to be authentic, trying some new</p> <p>15 methods in terms of how we capture that content</p> <p>16 so that it's not always polished, you know, the</p> <p>17 difference in the quality of the video, if you</p> <p>18 will, to make things be more authentic, whether</p> <p>19 that's capturing it with someone's phone.</p> <p>20 We continue to try to tell real</p> <p>21 stories of airmen, to answer questions like can</p> <p>22 I have a dog in the air force or can I get</p>

<p style="text-align: right;">Page 54</p> <p>1 married or, you know, can I continue to compete</p> <p>2 on a volleyball team or, you know, whatever</p> <p>3 that particular prospect's question might be</p> <p>4 that is really misinformed by their stereotype</p> <p>5 of serving in the military.</p> <p>6 BY MS. MILLIGAN:</p> <p>7 Q. And has -- has the amount that the</p> <p>8 air force recruiting service invests in social</p> <p>9 media to recruit increased in the time that you</p> <p>10 have been there?</p> <p>11 MR. SOSNOWSKY: Objection.</p> <p>12 Foundation.</p> <p>13 THE WITNESS: Are you talking about</p> <p>14 organic social media or paid social media at</p> <p>15 this point?</p> <p>16 BY MS. MILLIGAN:</p> <p>17 Q. Let's start with paid social media.</p> <p>18 A. The first time I actually asked how</p> <p>19 much we were spending on digital platforms, not</p> <p>20 specifically paid social, but digital in</p> <p>21 general, we were over 80 percent, and the last</p> <p>22 time I checked it, we were at 84 percent.</p>	<p style="text-align: right;">Page 56</p> <p>1 A. I would compare Twitch more --</p> <p>2 MR. SOSNOWSKY: Hold on. Sorry.</p> <p>3 Just let her finish the question.</p> <p>4 THE WITNESS: I'm sorry.</p> <p>5 MR. SOSNOWSKY: That's okay.</p> <p>6 BY MS. MILLIGAN:</p> <p>7 Q. -- versus a social media platform?</p> <p>8 A. I would compare Twitch more to like</p> <p>9 a YouTube because it's really more content that</p> <p>10 people are going and viewing. Yes, they are</p> <p>11 able to comment on it, but it's not purely</p> <p>12 driven by people posting content to one</p> <p>13 another.</p> <p>14 It's -- that's probably more of a</p> <p>15 personal observation than anything, but that's</p> <p>16 how I think about it.</p> <p>17 Q. All right. And then TikTok, is that</p> <p>18 an example of a social media platform?</p> <p>19 A. Yes. TikTok is a social media</p> <p>20 platform but it's not one that we are allowed</p> <p>21 to be on.</p> <p>22 Q. Understood. Okay. I'll come back</p>
<p style="text-align: right;">Page 55</p> <p>1 So it has not significantly changed.</p> <p>2 It would be within a few percentage points.</p> <p>3 Q. And what is your definition of paid</p> <p>4 social media?</p> <p>5 A. What is my definition of paid social</p> <p>6 media?</p> <p>7 Q. Yes. When you used the term "paid</p> <p>8 social media," what are you referring to?</p> <p>9 A. That's actually a media buy on a</p> <p>10 social media channel.</p> <p>11 Q. Okay. And what are -- what are</p> <p>12 social media channels?</p> <p>13 A. Facebook, Instagram, Twitter,</p> <p>14 LinkedIn.</p> <p>15 Q. What about Reddit?</p> <p>16 A. Yes.</p> <p>17 Q. Twitch?</p> <p>18 A. Yes. I would really call that more</p> <p>19 of a media platform but...</p> <p>20 Q. And when you -- what would you be</p> <p>21 differentiating between there by calling Twitch</p> <p>22 a media platform versus a --</p>	<p style="text-align: right;">Page 57</p> <p>1 -- oh, what about Snapchat?</p> <p>2 A. Yes.</p> <p>3 Q. Snapchat is a social media platform?</p> <p>4 A. Correct.</p> <p>5 Q. Okay. And then what do you mean</p> <p>6 when you use the word "organic social"?</p> <p>7 A. The way air force recruiting service</p> <p>8 talks about organic social, that is when we are</p> <p>9 actually posting content to our owned</p> <p>10 platforms, so that would be the air force</p> <p>11 recruiting service channel of Facebook,</p> <p>12 Twitter, et cetera.</p> <p>13 Q. And does it cost money for air force</p> <p>14 recruiting services to post on organic social</p> <p>15 media?</p> <p>16 MR. SOSNOWSKY: Objection.</p> <p>17 Foundation.</p> <p>18 THE WITNESS: It does not cost us</p> <p>19 money to post on our own channels, but we do</p> <p>20 work through GSD&amp;M and they post on our behalf.</p> <p>21 BY MS. MILLIGAN:</p> <p>22 Q. Why is that?</p>

<p style="text-align: right;">Page 58</p> <p>1 A. Primarily, it's a manpower issue.</p> <p>2 Q. Okay. And does air force recruiting</p> <p>3 service compensate GSD&amp;M for the use of its</p> <p>4 manpower as it relates to posting on organic</p> <p>5 social media?</p> <p>6 MR. SOSNOWSKY: Objection.</p> <p>7 Foundation.</p> <p>8 THE WITNESS: Yes, we do. We have a</p> <p>9 task order with them specifically for organic</p> <p>10 social media.</p> <p>11 BY MS. MILLIGAN:</p> <p>12 Q. All right. And then a few minutes</p> <p>13 ago, you said that the first time that you</p> <p>14 actually asked about how much you were</p> <p>15 spending, I had asked about your spend on</p> <p>16 social media -- strike that.</p> <p>17 I had asked about your spend on</p> <p>18 social media and you said that the first time</p> <p>19 you actually asked how much you were spending,</p> <p>20 you asked about spending on digital platforms</p> <p>21 not specifically social.</p> <p>22 Do you recall saying that?</p>	<p style="text-align: right;">Page 60</p> <p>1 media planning, is that -- do you think about</p> <p>2 it from that platform basis as opposed to the</p> <p>3 device basis?</p> <p>4 MR. SOSNOWSKY: Objection. Form.</p> <p>5 THE WITNESS: We try to look at it</p> <p>6 in terms of where our specific target audiences</p> <p>7 are spending the most amount of time. So when</p> <p>8 we look at a specific target audience, we are</p> <p>9 looking at how much time they are spending on a</p> <p>10 desktop, on a mobile device, on a traditional</p> <p>11 television, you know, so different I guess</p> <p>12 delivery methods of that media.</p> <p>13 BY MS. MILLIGAN:</p> <p>14 Q. Do the ads that air force recruiting</p> <p>15 services run for a given media plan change</p> <p>16 whether they are being viewed on a -- let's</p> <p>17 say, iPad pad versus an iPhone?</p> <p>18 MR. SOSNOWSKY: Objection. Form.</p> <p>19 THE WITNESS: No. No. It is more</p> <p>20 about the platform that the -- the target</p> <p>21 audience is visiting from whatever device they</p> <p>22 are using.</p>
<p style="text-align: right;">Page 59</p> <p>1 MR. SOSNOWSKY: Objection. Form.</p> <p>2 THE WITNESS: Yes.</p> <p>3 BY MS. MILLIGAN:</p> <p>4 Q. Okay. So what is encompassed in</p> <p>5 digital platforms that is -- that is not the</p> <p>6 paid social platforms we just discussed?</p> <p>7 MR. SOSNOWSKY: Objection. Form.</p> <p>8 THE WITNESS: That would also be any</p> <p>9 type of online advertising, streaming, well,</p> <p>10 websites are online, so I don't mean to be</p> <p>11 redundant, but we would consider digital</p> <p>12 anything that isn't linear broadcast or cinema,</p> <p>13 if we have to go through a digital platform to</p> <p>14 deliver the message.</p> <p>15 In this day and age, you can't think</p> <p>16 of it anymore as the -- as the, you know, piece</p> <p>17 of equipment somebody is viewing it from</p> <p>18 because they can view television on their iPad,</p> <p>19 also, right. So it has more to do with the --</p> <p>20 where the platform sets I guess so...</p> <p>21 BY MS. MILLIGAN:</p> <p>22 Q. And is that how -- in doing your</p>	<p style="text-align: right;">Page 61</p> <p>1 BY MS. MILLIGAN:</p> <p>2 Q. Okay. And so the same question</p> <p>3 about whether it's on laptop versus tablet</p> <p>4 versus iPhone?</p> <p>5 MR. SOSNOWSKY: Objection. Form.</p> <p>6 THE WITNESS: Yes. We would -- we</p> <p>7 would be more considerate of the platform as</p> <p>8 opposed to the device.</p> <p>9 BY MS. MILLIGAN:</p> <p>10 Q. Turning back to Exhibit 119, this is</p> <p>11 the e-mail with the TMT, and if you look</p> <p>12 actually now at the last two pages, so this is</p> <p>13 860601 and 860602, do you see that there are</p> <p>14 two messages that begin: "RSM Comments?"</p> <p>15 A. No -- yes. Okay.</p> <p>16 Q. Are these similar to the TMTs?</p> <p>17 MR. SOSNOWSKY: Objection. Form.</p> <p>18 THE WITNESS: One minute.</p> <p>19 BY MS. MILLIGAN:</p> <p>20 Q. I can ask a more specific question.</p> <p>21 At least the request in the first</p> <p>22 RSM comment message appears to be similar to</p>

<p style="text-align: right;">Page 254</p> <p>1 MS. MILLIGAN: This is prior to</p> <p>2 outreach by counsel, so --</p> <p>3 MR. SOSNOWSKY: I understand that,</p> <p>4 but I'm -- well, I can still instruct her just</p> <p>5 because she has already asked several questions</p> <p>6 about the time line. Okay. She says when she</p> <p>7 was with somebody that reached out --</p> <p>8 MS. MILLIGAN: Or you can just give</p> <p>9 the -- instruct -- just give the instruction to</p> <p>10 the witness.</p> <p>11 MR. SOSNOWSKY: Okay. So I'm going</p> <p>12 to instruct you not to reveal privileged</p> <p>13 communications or information or activities</p> <p>14 that were done at the instruction of counsel</p> <p>15 that came from counsel.</p> <p>16 THE WITNESS: Okay. Then, no, I</p> <p>17 can't answer that question.</p> <p>18 BY MS. MILLIGAN:</p> <p>19 Q. Okay. So your only knowledge of --</p> <p>20 of the air force's involvement in this</p> <p>21 litigation came from counsel or communications</p> <p>22 that were done at the direction of counsel?</p>	<p style="text-align: right;">Page 256</p> <p>1 concerns with."</p> <p>2 My primary function is to make sure</p> <p>3 that we are executing an efficient marketing</p> <p>4 plan in order to achieve an end recruiting</p> <p>5 mission. So insomuch as any vendor would be</p> <p>6 performing or not performing, that's really</p> <p>7 what I am looking at.</p> <p>8 BY MS. MILLIGAN:</p> <p>9 Q. So you did not have specific</p> <p>10 concerns as to Google?</p> <p>11 MR. SOSNOWSKY: Objection to form.</p> <p>12 THE WITNESS: I don't recall any</p> <p>13 specific issues or challenges or concerns with</p> <p>14 respect specifically to Google. But, again, it</p> <p>15 would have been as a part of a broader</p> <p>16 marketing program in order to meet an end</p> <p>17 recruitment mission.</p> <p>18 BY MS. MILLIGAN:</p> <p>19 Q. And earlier you said that you were</p> <p>20 not worrying about the lawsuit on a day-to-day</p> <p>21 basis.</p> <p>22 Are you worrying about it at all?</p>
<p style="text-align: right;">Page 255</p> <p>1 That's a yes-or-no question.</p> <p>2 MR. SOSNOWSKY: Object to form.</p> <p>3 But you can answer that yes or no.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MS. MILLIGAN:</p> <p>6 Q. Prior to this lawsuit in your -- in</p> <p>7 your role at the air force, were you aware of</p> <p>8 any anticompetitive conduct on the part of</p> <p>9 Google affecting U.S. Air Force's advertising?</p> <p>10 MR. SOSNOWSKY: Objection to form.</p> <p>11 Foundation.</p> <p>12 THE WITNESS: No, I don't believe I</p> <p>13 was.</p> <p>14 BY MS. MILLIGAN:</p> <p>15 Q. Prior to this lawsuit, did you have</p> <p>16 any concerns that Google was engaging in</p> <p>17 anticompetitive conduct related to digital</p> <p>18 advertising?</p> <p>19 MR. SOSNOWSKY: Objection to form.</p> <p>20 Foundation.</p> <p>21 THE WITNESS: Again, I just -- I</p> <p>22 want to be clear when you use words like "have</p>	<p style="text-align: right;">Page 257</p> <p>1 MR. SOSNOWSKY: Objection to form.</p> <p>2 THE WITNESS: Am I worrying about a</p> <p>3 lawsuit at all; is that what you're asking?</p> <p>4 BY MS. MILLIGAN:</p> <p>5 Q. Yeah. Yes.</p> <p>6 MR. SOSNOWSKY: Same objections.</p> <p>7 THE WITNESS: No. Again, I have</p> <p>8 such a long list of things to do that this is</p> <p>9 not high on that priority list.</p> <p>10 BY MS. MILLIGAN:</p> <p>11 Q. Prior to this lawsuit -- sorry.</p> <p>12 Strike that.</p> <p>13 Where on the priority list is it?</p> <p>14 MR. SOSNOWSKY: Objection to form.</p> <p>15 THE WITNESS: Well down below all of</p> <p>16 those other things that get us to meeting</p> <p>17 mission requirements and any other special</p> <p>18 projects that I get assigned to in order to</p> <p>19 make things at air force recruitment service</p> <p>20 marketing work better.</p> <p>21 BY MS. MILLIGAN:</p> <p>22 Q. And earlier we mentioned</p>



<p style="text-align: right;">Page 258</p> <p>1 communications with counsel and communications</p> <p>2 at the direction of counsel.</p> <p>3 So setting aside that first</p> <p>4 category, how did you know that certain</p> <p>5 communications were at the direction of</p> <p>6 counsel?</p> <p>7 MR. SOSNOWSKY: Objection to form.</p> <p>8 THE WITNESS: Yeah. I'm not sure I</p> <p>9 understand the question.</p> <p>10 BY MS. MILLIGAN:</p> <p>11 Q. Did you ever receive a communication</p> <p>12 related to this litigation that you understood</p> <p>13 was at the direction of counsel but did not</p> <p>14 include a lawyer on the communication?</p> <p>15 MR. SOSNOWSKY: Objection to form.</p> <p>16 Foundation.</p> <p>17 THE WITNESS: I don't recall.</p> <p>18 BY MS. MILLIGAN:</p> <p>19 Q. Did anyone at GSD&amp;M ever tell you</p> <p>20 that Google was engaging in anticompetitive</p> <p>21 conduct?</p> <p>22 A. No.</p>	<p style="text-align: right;">Page 260</p> <p>1 MR. SOSNOWSKY: Objection. Form.</p> <p>2 THE WITNESS: I had not heard the</p> <p>3 term that you just said, open web whatever,</p> <p>4 until I read the lawsuit, so no.</p> <p>5 BY MS. MILLIGAN:</p> <p>6 Q. What do you -- do you understand</p> <p>7 what that term means?</p> <p>8 A. It's really not kind of what I am</p> <p>9 doing on a day-to-day basis because, again, I</p> <p>10 am not a media buyer and I don't have that</p> <p>11 background or knowledge.</p> <p>12 We refer to it as programmatic</p> <p>13 display or data-driven display. So those terms</p> <p>14 I have a little bit of understanding or better</p> <p>15 understanding of but not the one that -- I've</p> <p>16 already forgotten what you said. Sorry. Open</p> <p>17 web whatever.</p> <p>18 Q. Did you ever heard -- did you ever</p> <p>19 hear the term "open web display advertising"</p> <p>20 used when you were responsible for the Weber</p> <p>21 Shandwick contract with the army?</p> <p>22 MR. SOSNOWSKY: Objection to form.</p>
<p style="text-align: right;">Page 259</p> <p>1 Q. Did anyone at GSD&amp;M ever tell you</p> <p>2 that Google was causing you to pay more for</p> <p>3 digital advertising?</p> <p>4 MR. SOSNOWSKY: Objection to form.</p> <p>5 THE WITNESS: We look at how each of</p> <p>6 the vendors are performing against benchmark,</p> <p>7 how they're performing against those key</p> <p>8 performance indicators that we've talked about,</p> <p>9 whether that be impressions, engagements, or</p> <p>10 new contacts.</p> <p>11 So any context where we would have</p> <p>12 had a conversation about how any vendor was</p> <p>13 performing would have been, again, in the</p> <p>14 context of performance only and efficiency</p> <p>15 inasmuch as the -- the channel or the vendor or</p> <p>16 the tactic was performing against either a</p> <p>17 previous year or a benchmark.</p> <p>18 BY MS. MILLIGAN:</p> <p>19 Q. Okay. And so did anyone at GSD --</p> <p>20 GSD&amp;M ever tell you that Google was causing air</p> <p>21 force to pay more for open web display</p> <p>22 advertising?</p>	<p style="text-align: right;">Page 261</p> <p>1 THE WITNESS: No. Like I said, I'd</p> <p>2 never heard that term before.</p> <p>3 BY MS. MILLIGAN:</p> <p>4 Q. Do you have a practice of encrypting</p> <p>5 your e-mails?</p> <p>6 MR. SOSNOWSKY: Objection.</p> <p>7 THE WITNESS: I don't think that</p> <p>8 there is a way to encrypt e-mails unless it's</p> <p>9 already encrypted through the government</p> <p>10 system, but that's way beyond my knowledge</p> <p>11 base.</p> <p>12 BY MS. MILLIGAN:</p> <p>13 Q. Okay. So you personally -- you</p> <p>14 don't have a practice of encrypting your</p> <p>15 e-mails at work?</p> <p>16 A. No. I am not even sure I would know</p> <p>17 how to do that if there was a way to do it.</p> <p>18 Q. Do you use your personal e-mail for</p> <p>19 work purposes?</p> <p>20 A. Not generally, no.</p> <p>21 Q. Have you ever used your personal</p> <p>22 e-mail for work purposes?</p>

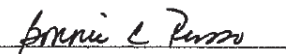


<p style="text-align: right;">Page 262</p> <p>1 A. I did go back and look to see if I</p> <p>2 had ever done that, and I counted a total of</p> <p>3 six e-mails in the two and a half years. Three</p> <p>4 of them were about manning a position that we</p> <p>5 were getting ready to hire that had nothing to</p> <p>6 do with media buying. Two of them were me</p> <p>7 sending something to myself to print out at</p> <p>8 home. It was like a W-2 and pay stub. And one</p> <p>9 of them was an e-mail I sent while on vacation</p> <p>10 to a colleague who was having a bad day.</p> <p>11 Q. Okay. So those are e-mails that you</p> <p>12 sent from your personal e-mail to your work</p> <p>13 e-mail?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Do you know if you have ever</p> <p>16 -- so you mentioned those six e-mails. Do you</p> <p>17 know if you ever deleted anything from your</p> <p>18 personal e-mail that related to work?</p> <p>19 A. No. They are all still there.</p> <p>20 Q. Meaning could there have been more</p> <p>21 than those six e-mails?</p> <p>22 MR. SOSNOWSKY: Objection to</p>	<p style="text-align: right;">Page 264</p> <p>1 before I would do that.</p> <p>2 Q. Do you know if the chats within the</p> <p>3 videos are saved at -- once the video closes?</p> <p>4 A. I don't know. You would have to ask</p> <p>5 our IT folks for that.</p> <p>6 Q. And you said you know there is a</p> <p>7 chat function in Teams separate from the video.</p> <p>8 Have you ever used that chat</p> <p>9 function for work purposes?</p> <p>10 A. It is certainly possible. We have</p> <p>11 lots of cross-functional teams all the time</p> <p>12 that are, you know, working on various</p> <p>13 initiatives. So I am sure at some point that I</p> <p>14 have used it.</p> <p>15 Q. What about your personal phone? Do</p> <p>16 you use your personal phone for work purposes?</p> <p>17 A. I will use it to send a text message</p> <p>18 typically about, you know, if somebody is</p> <p>19 running late or something like that, but that's</p> <p>20 really about it.</p> <p>21 Q. And do you use any other messaging</p> <p>22 platforms in the course of your work?</p>
<p style="text-align: right;">Page 263</p> <p>1 foundation.</p> <p>2 THE WITNESS: It's possible, but it</p> <p>3 would have only been, like, maybe in the first</p> <p>4 couple of days that I was working and I hadn't</p> <p>5 gotten an e-mail -- e-mail address set up at</p> <p>6 work yet.</p> <p>7 BY MS. MILLIGAN:</p> <p>8 Q. And do you know if your personal</p> <p>9 e-mail was collected for purposes of this</p> <p>10 litigation?</p> <p>11 A. I am not aware that it was, no.</p> <p>12 Q. Are you -- do you know whether your</p> <p>13 work e-mail was collected for purposes of this</p> <p>14 litigation?</p> <p>15 A. It's my understanding that it was,</p> <p>16 yes.</p> <p>17 Q. Do you use Teams chat?</p> <p>18 A. We use Teams for, like, video</p> <p>19 conference calls, and there are -- there are</p> <p>20 chats open in that, and I know that there is a</p> <p>21 chat function on Teams, but I typically don't</p> <p>22 use Teams in a chat function. I would e-mail</p>	<p style="text-align: right;">Page 265</p> <p>1 A. Like -- give me an example.</p> <p>2 Q. Skype?</p> <p>3 A. Oh, no.</p> <p>4 MS. MILLIGAN: Can we take a break?</p> <p>5 MR. SOSNOWSKY: Sure.</p> <p>6 THE VIDEOGRAPHER: The time is 4:31</p> <p>7 p.m. We are off the record.</p> <p>8 (A short recess was taken.)</p> <p>9 THE VIDEOGRAPHER: The time is 4:41</p> <p>10 p.m. This begins Unit 5. We are on the</p> <p>11 record.</p> <p>12 MS. MILLIGAN: Ms. Stott, I don't</p> <p>13 have any further questions. I want to thank</p> <p>14 you for your time.</p> <p>15 Subject to any further questioning</p> <p>16 from your counsel, I won't have any further</p> <p>17 questions.</p> <p>18 MR. SOSNOWSKY: No -- no questions</p> <p>19 on our side but we would like to read and sign.</p> <p>20 MS. MILLIGAN: Okay. Great. Thank</p> <p>21 you.</p> <p>22 MR. SOSNOWSKY: Thank you.</p>

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1 THE VIDEOGRAPHER: The time is 4:42  
 2 p.m. We are off the record.  
 3 (Whereupon, the proceeding was  
 4 concluded at 4:42 p.m.)  
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1 CERTIFICATE OF NOTARY PUBLIC  
 2 I, Bonnie L. Russo, the officer before  
 3 whom the foregoing deposition was taken, do  
 4 hereby certify that the witness whose testimony  
 5 appears in the foregoing deposition was duly  
 6 sworn by me; that the testimony of said witness  
 7 was taken by me in shorthand and thereafter  
 8 reduced to computerized transcription under my  
 9 direction; that said deposition is a true  
 10 record of the testimony given by said witness;  
 11 that I am neither counsel for, related to, nor  
 12 employed by any of the parties to the action in  
 13 which this deposition was taken; and further,  
 14 that I am not a relative or employee of any  
 15 attorney or counsel employed by the parties  
 16 hereto, nor financially or otherwise interested  
 17 in the outcome of the action.  
 18  
 19   
 20 Notary Public in and for  
 21 the District of Columbia  
 22 My Commission expires: August 14, 2025.

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1 Mark Sosnowsky, Esq.  
 2 mark.sosnowsky@usdoj.gov  
 3 September 19, 2023  
 4 RE: United States, Et Al v. Google, LLC  
 5 9/18/2023, Lara Stott (#6097869)  
 6 The above-referenced transcript is available for  
 7 review.  
 8 Within the applicable timeframe, the witness should  
 9 read the testimony to verify its accuracy. If there are  
 10 any changes, the witness should note those with the  
 11 reason, on the attached Errata Sheet.  
 12 The witness should sign the Acknowledgment of  
 13 Deponent and Errata and return to the deposing attorney.  
 14 Copies should be sent to all counsel, and to Veritext at  
 15 erratas-cs@veritext.com  
 16  
 17 Return completed errata within 30 days from  
 18 receipt of testimony.  
 19 If the witness fails to do so within the time  
 20 allotted, the transcript may be used as if signed.  
 21  
 22 Yours,  
 23 Veritext Legal Solutions  
 24  
 25

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1 United States, Et Al v. Google, LLC  
 2 Lara Stott (#6097869)  
 3 E R R A T A S H E E T  
 4 PAGE \_\_\_\_ LINE \_\_\_\_ CHANGE \_\_\_\_  
 5  
 6 REASON \_\_\_\_  
 7 PAGE \_\_\_\_ LINE \_\_\_\_ CHANGE \_\_\_\_  
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 21 REASON \_\_\_\_  
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 24 Lara Stott Date  
 25